

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA  
ALEXANDRIA DIVISION**

ICONTROL NETWORKS, INC.

Plaintiff,

V.

ALARM.COM INCORPORATED;  
FRONTPOINT SECURITY SOLUTIONS, LLC

Defendants.

Civil Action No. 1:13-cv-834-LMB/IDD

## JURY TRIAL DEMANDED

**DECLARATION OF MARY A. PROCACCIO-FLOWERS IN SUPPORT OF  
PLAINTIFF ICONTROL NETWORKS, INC.'S RESPONSE TO DEFENDANTS'  
MOTION TO SEAL**

I, Mary A. Procaccio-Flowers, declare as follows:

1. I am an attorney of the law firm of Wilson Sonsini Goodrich & Rosati, counsel for Plaintiff iControl Networks, Inc. (“iControl”). I am admitted to the bar in the State of California, and I am admitted *pro hac vice* in this case. I make this declaration on my own personal knowledge. If called to testify as to the truth of the matters stated herein, I could and would do so competently.

2. Attached to Joint Motion To Dismiss Count 1 of the Complaint for Lack of Standing (Doc. No. 79) (“Motion to Dismiss”) is the deposition of one of iControl’s principals that contains testimony concerning the private transfer of rights and ownership of, among other things, one of the patents at issue.

3. The information contained in the deposition testimony referred to in paragraph 2 is not generally known to the public and the disclosure of it would cause competitive harm to iControl.

4. The specific information that Alarm.com seeks to seal is proprietary and relates to information concerning the ownership of patent rights that has not been made public by iControl.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct to the best of my knowledge.

Executed on November 13, 2013 in Palo Alto, California.

*Mary A. Procaccio-Flowers*

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Mary A. Procaccio-Flowers

Dated: November 13, 2013

Respectfully submitted,

/s/ Stephen E. Noona

Stephen E. Noona

Virginia State Bar No. 25367

Mark E. Warmbier

Virginia State Bar No. 77993

Matthew B. Chmiel

Virginia State Bar No. 65334

KAUFMAN & CANOLES, P.C.

150 W. Main Street, Suite 2100

Norfolk, VA 23510-1665

Telephone: (757) 624-3000

Facsimile: (757) 624-3169

Email: [mewarmbier@kaufcan.com](mailto:mewarmbier@kaufcan.com)

Email: [senoona@kaufcan.com](mailto:senoona@kaufcan.com)

Email: [mbchmiel@kaufcan.com](mailto:mbchmiel@kaufcan.com)

James C. Yoon (*pro hac vice*)

Ryan R. Smith (*pro hac vice*)

Alyssa N. Knutson (*pro hac vice*)

Mary Procaccio-Flowers (*pro hac vice*)

WILSON SONSINI GOODRICH & ROSATI

Professional Corporation

650 Page Mill Road

Palo Alto, CA 94304-1050

Telephone: (650) 493-9300

Facsimile: (650) 493-6811

Email: [jyoon@wsgr.com](mailto:jyoon@wsgr.com)

Email: [rsmith@wsgr.com](mailto:rsmith@wsgr.com)

Email: [aknutson@wsgr.com](mailto:aknutson@wsgr.com)

Email: [mprocaccioflowers@wsgr.com](mailto:mprocaccioflowers@wsgr.com)

*Counsel for Plaintiff iControl Networks, Inc.*

**CERTIFICATE OF SERVICE**

I hereby certify that on November 13, 2013, I will electronically file the foregoing with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to the following:

Marc Khadpe (*pro hac vice*)  
Teena-Ann Sankoorikal (*pro hac vice*)  
Daniel Weinstein (*pro hac vice*)  
Andrei Harasymiak (*pro hac vice*)  
Roger Brooks (*pro hac vice*)  
Stefan Howard Atkinson (*pro hac vice*)  
**CRAVATH, SWAINE & MOORE LLP**  
Worldwide Plaza  
825 Eighth Avenue  
New York, NY 10019  
Telephone: 212-474-1000  
Facsimile: 212-474-3700  
Email: [mkhadpe@cravath.com](mailto:mkhadpe@cravath.com)  
Email: [tsankoorikal@cravath.com](mailto:tsankoorikal@cravath.com)  
Email: [dweinstein@cravath.com](mailto:dweinstein@cravath.com)  
Email: [aharasymiak@cravath.com](mailto:aharasymiak@cravath.com)  
Email: [rgbrooks@cravath.com](mailto:rgbrooks@cravath.com)

Dabney J. Carr, IV  
Robert A. Angle  
**TROUTMAN SANDERS LLP**  
P.O. Box 1122  
Richmond, Virginia 23218-1122  
[dabney.carr@troutmansanders.com](mailto:dabney.carr@troutmansanders.com)  
[roberts.angle@troutmansanders.com](mailto:roberts.angle@troutmansanders.com)

*Counsel for Defendant Alarm.com, Inc.*

Michael A. Oakes  
Virginia State Bar No. 42745  
Alysa N. Youngson  
Virginia State Bar No. 82838  
**HUNTON & WILLIAMS LLP**  
2200 Pennsylvania Avenue, N.W.  
Washington, DC 20037  
Telephone: (202) 955-1500  
Facsimile: (202) 778-2201  
[moakes@hunton.com](mailto:moakes@hunton.com)  
[ayoungson@hunton.com](mailto:ayoungson@hunton.com)

*Counsel for Defendant FrontPoint Security  
Solutions, LLC*

/s/ Stephen E. Noona

Stephen E. Noona  
Virginia State Bar No. 25367  
Mark E. Warmbier  
Virginia State Bar No. 77993  
Matthew B. Chmiel  
Virginia State Bar No. 65334  
KAUFMAN & CANOLES, P.C.  
150 W. Main Street, Suite 2100  
Norfolk, VA 23510-1665  
Telephone: (757) 624-3000  
Facsimile: (757) 624-3169  
Email: [mewarmbier@kaufcan.com](mailto:mewarmbier@kaufcan.com)  
Email: [senoona@kaufcan.com](mailto:senoona@kaufcan.com)  
Email: [mbchmiel@kaufcan.com](mailto:mbchmiel@kaufcan.com)

James C. Yoon (*pro hac vice*)  
Ryan R. Smith (*pro hac vice*)  
Alyssa N. Knutson (*pro hac vice*)  
Mary Procaccio-Flowers (*pro hac vice*)  
WILSON SONSINI GOODRICH & ROSATI  
Professional Corporation  
650 Page Mill Road  
Palo Alto, CA 94304-1050  
Telephone: (650) 493-9300  
Facsimile: (650) 493-6811  
Email: [jyoon@wsgr.com](mailto:jyoon@wsgr.com)  
Email: [rsmith@wsgr.com](mailto:rsmith@wsgr.com)  
Email: [aknutson@wsgr.com](mailto:aknutson@wsgr.com)  
Email: [mprocaccioflowers@wsgr.com](mailto:mprocaccioflowers@wsgr.com)

*Counsel for Plaintiff iControl Networks, Inc.*